

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

January 8, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to this Court's Individual Practices III.e., Plaintiffs file this letter motion to request oral argument of (1) Plaintiffs' Motion to Compel; and (2) the Kingdom of Saudi Arabia's Application to Modify the Plaintiffs' First Set of Supplemental Document Requests concerning Musaed Al Jarrah, Smail Mana, and Mohamed Al Muhanna. Briefing on Plaintiffs' Motion and the Kingdom's Application was completed today.

Plaintiffs believe that oral argument would be of assistance to the Court in addressing the complex facts and numerous exhibits raised by the Motion and Application.

Prior to sending this letter, the PECs contacted Michael Kellogg, Esq., counsel for Saudi Arabia, and were informed that Saudi Arabia has no objection to Plaintiffs' request.

Finally, in relation to this request, the PECs note that several members of the PECs and a number of defense counsel will be in Madrid, Spain from January 21, 2019 through January 25, 2019 for depositions of Dallah Avco and IIRO witnesses.

The Honorable Sarah Netburn
January 8, 2019
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Respectfully submitted,

COZEN O'CONNOR

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MDL 1570 Plaintiffs' Exec. Committee
for Commercial Claims

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/s/ Robert T. Haefele, Esquire

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

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MDL 1570 Plaintiffs' Exec. Committee
for Personal Injury and Death Claims

cc: All Counsel via ECF